

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PREMIER HEALTHCARE SOLUTIONS,
INC., CONDUCTIV CONTRACTS, LLC
and CONDUCTIV, INC.,

Plaintiffs,

v.

THOMAS JEFFERSON UNIVERSITY,

Defendant.

Civil Action No.:

2:25-CV-2302-MKC

**JOINT STIPULATION TO EXTEND
TIME FOR DEFENDANT
THOMAS JEFFERSON UNIVERSITY
TO RESPOND TO PLAINTIFFS'
AMENDED COMPLAINT**

Filed Concurrently With:
[Proposed] Order

Amended Complaint Served: 05/12/2025
Response Due: 07/11/2025
New Response Date: 07/25/2025

Hon. Mary Kay Costello
United States District Judge

Plaintiffs Premier Healthcare Solutions, Inc., Conductiv Contracts, LLC, and Conductiv, Inc., and Defendant Thomas Jefferson University (collectively, "Parties"), by and through their respective counsel of record, stipulate and agree to extend the time for Defendant to respond to Plaintiffs' Amended Complaint [Dkt. 15] as follows:

1. On May 9, 2025, Plaintiffs filed and entered an Amended Complaint in the above-captioned matter [Dkt. 15].
2. On May 9, 2025, Plaintiffs also filed a Summons, which was issued on May 12, 2025 [Dkt. 16].

3. On May 12, 2025, Defendant filed a Waiver of the Service of Summons [Dkt. 17], which included an acknowledgment that Defendant “must file and serve an answer or a motion under Rule 12 within 60 days from 05/12/2025, the date when this request was sent[.]”

4. In order to allow the Parties additional time to discuss and to confer about the allegations in the Amended Complaint, Defendant's arguments concerning the allegations, and potential resolution of the allegations, the Parties hereby stipulate and agree to an additional two-week extension of time for Defendant to respond to Plaintiffs' Amended Complaint, through and including July 25, 2025.

5. There have not been any prior requests for extensions.

IT IS SO STIPULATED.

DATED: July 9, 2025 OBERMAYER REBMAN MAXWELL & HIPPEL LLP

By: /s/ Brooke E. Newborn
Brooke E. Newborn, Esquire (#209732)
/s/ Nicholas Poduslenko
Nicholas Poduslenko, Esquire (#51562)

Counsel for Defendant Thomas Jefferson University Hospital

DATED: July 9, 2025 STAPLETON SEGAL COCHRAN LLC

By: /s/ Jonathan L. Cochran
Jonathan L. Cochran (PA ID 314382)

--and--

YOUNG CONAWAY STARGATT & TAYLOR,
LLP
Tammy L. Mercer (pro hac vice forthcoming)
Amanda K. Pooler (pro hac vice forthcoming)

*Counsel for Plaintiffs Premier Healthcare Solutions, Inc.,
Conductive Contracts, LLC, and Conductive, Inc.*